

### REMARKS

Claims 30 and 32-39 have been withdrawn in response to the restriction requirement of June 5, 2006. Additionally, claim 19 has been amended to address certain grammatical errors in the claim as previously presented. No other amendments have been made to the pending claims. No new matter is believed or intended to have been introduced by the present amendments, all of which find support in at least the claims, description, and drawings as originally filed.

The office action mailed January 17, 2008 ("Office Action") rejected each of the pending claims as anticipated by U.S. 2007/0156677 ("Szabo"). However, after reviewing that reference, the applicants submit that the pending rejections should be withdrawn because each of the pending claims includes limitations not taught or suggested in Szabo. Arguments directed to each of the pending claims are set forth below.

#### Claim 1

The applicants note that claim 1 recites encoding an embedded navigation link in content retrieved from a content provider so that the embedded navigation link appears to be associated with a second domain which is associated with a support location, and then replacing the embedded navigation link in the retrieved content with the encoding of the embedded navigation link. The Office Action asserted that those limitations were taught in paragraphs 230 and 255-256 of Szabo.<sup>1</sup> However, after reviewing those passages, the applicants assert that they are simply irrelevant to the limitations discussed above. Paragraph 230 discloses that metadata tags inserted into documents by authors can be used to categorize and index those documents.<sup>2</sup> This disclosure is simply irrelevant to the aspects of claim 1 discussed above for at least the following reasons:

- 1) paragraph 230 does not even suggest replacing anything in a retrieved content document. Instead that paragraph teaches that metadata tags are part of the original document, rather than replacing something else. Indeed, Szabo explicitly teaches away from changing the

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<sup>1</sup> Office Action at 4.

<sup>2</sup> Szabo ¶ 230 ("A particular advantage is obtained by employing pre-encoded tags present in source documents for the purpose of identifying the content of such documents for categorization thereof. Typically, the author of a document includes one or more tags or metadata that describe the document or provide key words to assist in automatic indexing thereof.").

metadata tags by stating that “a preferred embodiment according to the present invention *preserves* this valuable content-descriptive information for later categorization.” (emphasis added)

- 2) paragraph 230 explains that the metadata tags are used “for the purpose of identifying the content of such documents for categorization thereof.” This is an entirely different function from navigation which is achieved by the embedded navigation links discussed above. Accordingly, paragraph 230’s treatment of metadata tags cannot be treated as teaching or suggesting the particular operations on navigation links described in claim 1.
- 3) paragraph 230 does not include any treatment at all of encoding navigation links (or anything else) so that they appear to be associated with a second domain associated with a support location. Indeed, paragraph 230 does not even mention different domains or providing support. Accordingly, paragraph 230 does not teach or suggest the limitations discussed above related to encoding an embedded navigation link so that it appears to be associated with a second domain associated with a support location.

The other section of Szabo cited by the office action, paragraphs 255-56, is also completely irrelevant. Paragraph 255 discloses ranking search engine results based on considerations of factors which are content independent (e.g., investment in the site, or frequency of visits to the site) as well as factors which depend on a web site’s content.<sup>3</sup> Paragraph 256 describes techniques for weighting data for search engine results so that the most relevant results are presented. Neither of those paragraphs teaches or suggests replacing navigation links in retrieved content with encoded navigation links. Neither of those paragraphs teaches or suggests encoding links so they appear to be associated with domains associated with support locations. In general, neither of those paragraphs has anything to do with the invention recited in claim 1. Accordingly, the rejection of claim 1 as anticipated by Szabo under 35 U.S.C. § 102 should be withdrawn, and that claim should be allowed in its current form.

#### Claims 2-7 and 9-12

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<sup>3</sup> Szabo, ¶ 255 (“It is known in the art of search engines to rank objects according to their quality...independent of content. ... On the other hand, objects may also be ranked according to their relevance to a particular problem, i.e., in content or context-sensitive manner... One embodiment of the present invention, therefore, advantageously employs both types of classification data in order to determine the ranking of a record corresponding to a query.”).

The applicants note that each of claims 2-7 and 9-12 depend from, and therefore incorporate each novel limitation of, claim 1. Accordingly, the rejections of claims 2-7 and 9-12 should be withdrawn for at least the reasons given above with regard to claim 1.

In addition to including the novel limitations of claim 1, claims 2-7 and 9-12 each recite additional limitations which provide an independent basis for patentability. Of those limitations, the applicants particularly draw the examiner's attention to the limitations of "the content corresponding to the decoded embedded navigation link is received from the content location" from claim 6, "the embedded navigation link is associated with a first transport protocol and the end-user support is associated with a second transport protocol" from claim 9, and "the embedded navigation link is a first embedded navigation link and wherein the first navigation link is associated with the first domain and wherein the retrieved content includes a second navigation link associated with the second domain" from claim 10, each of which was completely ignored in the Office Action. In light of the failure to address those limitations, the applicants assert that, even if claims 2-7 and 9-12 were not allowable for the reasons given regarding claim 1, the rejections of claims 6, 9 and 10 (and their respective dependent claims) would be improper and should be withdrawn.

#### Claim 13

The applicants note that claim 13 recites a system comprising an annotation server in communication with an automated support system wherein the annotation server is configured to encode content which originates from two different domains so that it appears to a user that the content originates from a single domain which is remote relative to the user. In rejecting claim 13, the Office Action asserted that those features are taught by paragraphs 28-29 and 127 of Szabo.<sup>4</sup> However, after reviewing those passages, the applicants assert that they are completely irrelevant to the aspects of claim 13 discussed above. Paragraph 28 discloses an approach to information storage, searching and retrieval which includes categorizing documents using a predetermined set of categories for the purpose of generating a summary for a user. Paragraph 29 discloses an approach to information storage, searching and retrieval which, in addition to using categories to generate summaries for a user, automatically generates a search query for

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<sup>4</sup> Office Action, page 6.

retrieving information. Those paragraphs are irrelevant to the features of claim 13 discussed above for at least the following reasons:

- 1) paragraphs 28-29 do not mention or include any suggestion of changing the apparent domain of origin for any content retrieved for a user;
- 2) paragraphs 28-29 do not mention that any of the information retrieval functions can be performed by an annotation server which is in communication with an automated support system. Indeed, paragraphs 28-29 do not mention an automated support system *at all*.

Additionally, upon review of paragraph 127, the applicants submit that that paragraph cannot compensate for the shortcomings of paragraphs 28-29 noted above. The reason is that paragraph 127 reads, in its entirety, as follows:

Brusilovsky, P., Eklund, J.: "A study of user model based link annotation in educational hypermedia"; Journal of Universal Computer Science, Vol. 4 No 4 (1998) 429-448.

To the extent that the Examiner believes that the paper cited in paragraph 127 teaches or suggests some aspect of claim 13, the applicants request that the Examiner cite the appropriate portions of that paper. However, to the extent that the Examiner seeks to base some aspect of the rejection of claim 13 on paragraph 127 itself, the applicants must respectfully traverse that rejection, as paragraph 127 does not provide a disclosure of anything, let alone of some aspect of claim 13. Accordingly, since none of the passages cited in the office action teaches or suggests the limitations discussed above with regard to claim 13, the rejection of that claim should be withdrawn, and the claim should be allowed.

#### Claims 14-19

The applicants note that each of claims 14-19 depend from, and therefore incorporate each novel limitation of, claim 13. Accordingly, the rejections of claims 14-19 should be withdrawn for at least the reasons given above with regard to claim 13.

In addition to including the novel limitations of claim 13, claims 14-19 each recite additional limitations which provide an independent basis for patentability. Of those limitations, the applicants particularly draw the examiner's attention to the limitations of claim 19, which were simply ignored in the Office Action. Claim 19 itself describes certain details of the annotation server which, as recited in claim 13, is in communication with the automated support system. The Office Action treated claims 13 and 19 together, but provided absolutely no

treatment of the specific limitations found in claim 19 which are absent from claim 13.<sup>5</sup> Further, regarding the annotation server in communication with the automated support system, the only portion of Szabo which was cited as teaching that server was paragraph 127.<sup>6</sup> As set forth above, paragraph 127 is simply a citation to a paper which was not included or cited in the Office Action. Accordingly, for the additional reason that the pending rejections have not identified any teaching or suggestion of an annotation server in communication with an automated support system at all, let alone one with the specific characteristics recited in claim 19, the rejection of claim 19 should be withdrawn, and that claim should be allowed in its current form.

#### Claim 20

The applicants note that the Office Action's treatment of claim 20 was combined with its treatment of claim 1, and that the combined treatment addressed *only* the limitations found in claim 1.<sup>7</sup> As a result, the unique features of claim 20 were simply omitted from the Office Action. For example, the step of identifying each of the plurality of embedded links included in data received from a content provider is not addressed in the Office Action. Similarly, the Office Action did not address the feature that the first of the plurality of embedded links is encoded responsive to the first of the plurality of links being associated with a first domain associated with the content provider. Thus, because the Office Action's combined treatment of claims 1 and 20 addressed only limitations found in claim 1, and because claim 20 includes limitations which are not found in claim 1, the rejection of claim 20 should be withdrawn, and that claim should be allowed in its current form.

#### Claims 22-24

The applicants note that each of claims 22-24 depend from, and therefore incorporate each novel limitation of, claim 20. Accordingly, the rejections of claims 22-24 should be withdrawn for at least the reasons given above with regard to claim 20.

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<sup>5</sup> Office Action at 5-6.

<sup>6</sup> Office Action at 6.

Claim 25

Like claim 20, the Office Action's treatment of claim 25 was combined with its treatment of claim 1.<sup>8</sup> Thus, because the Office Action's treatment of claim 1 addressed only the limitations of claim 1,<sup>9</sup> the unique features of claim 20 were simply omitted from the Office Action. For example, the step of identifying each of the plurality of embedded links included in data received from a content provider is not addressed in the Office Action. Similarly, the Office Action did not address the feature that the first of the plurality of embedded links is encoded responsive to the first of the plurality of links being associated with a first domain associated with the content provider. Thus, because the Office Action's combined treatment of claims 1 and 25 addressed only limitations found in claim 1, and because claim 25 includes limitations which are not found in claim 1, the rejection of claim 25 should be withdrawn, and that claim should be allowed in its current form.

Claims 27-28

The applicants note that each of claims 27-28 depend from, and therefore incorporate each novel limitation of, claim 25. Accordingly, the rejections of claims 27-28 should be withdrawn for at least the reasons given above with regard to claim 25.

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<sup>7</sup> Office Action at 3-4.

<sup>8</sup> Office Action at 3.

<sup>9</sup> Office Action at 3-4.

Conclusion

In light of the arguments made herein, it is respectfully submitted that the claims of the present application meet the requirements of patentability under 35 U.S.C. § 102. Additionally, the applicants submit that the above discussion does not constitute an exhaustive list of novel limitations or reasons why the pending claims should be allowed. To the extent that applicants have not addressed certain aspects of the present rejection, or seem to have adopted certain aspects of the present rejection in the arguments made herein, please do not construe the same as an admission as to the merits of the rejections. Indeed, applicants reserve all arguments not explicitly set forth herein.

If questions persist or additional matters need to be dealt with prior to allowance, the applicants encourage the Examiner to contact their representative, William Morriss, at [wmorriss@fbtlaw.com](mailto:wmorriss@fbtlaw.com) or 513-651-6915.

The Commissioner for Patents is hereby authorized to charge any deficiency or credit any overpayment of fees to Frost Brown Todd LLC Deposit Account No. 06-2226.

Respectfully Submitted,  
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